

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEBRA DEAN, individually, and on )  
behalf of all those similarly situated, )  
  )  
   )  
Plaintiff,                                 )  
v.   )      No. 15 CV 08478  
   )  
   )  
KATES DETECTIVE & SECURITY         )  
SERVICES AGENCY and SPECIAL         )      Magistrate Judge M. David Weisman  
EVENTS SERVICES, INC.,                 )  
   )  
Defendant.                                 )

**PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF  
SETTLEMENT, PETITION FOR ATTORNEYS' FEES, AND ENHANCEMENT  
PAYMENT**

Plaintiff, on behalf of herself and a Class of similarly-situated individuals, moves this Court for final approval of the parties' Settlement Agreement, an award of attorneys' fees, and of an Enhancement Payment to the Named Plaintiff. Class Counsel has negotiated the settlement of this FLSA collective action and Rule 23 class action on behalf of the putative Class, 18 of whom have filed Claim Forms to join this action. The settlement creates a common fund of \$81,540.27. Plaintiff petitions for an award of one-third of the common fund as attorneys' fees in this matter, totaling \$27,180.09. Plaintiff also petitions for the award of an Enhancement Payment of \$3,000 for the Named Plaintiff, in recognition of her contributions to the successful resolution of this lawsuit. In support of this Motion, Plaintiff submits a supporting Memorandum of Law.

Respectfully submitted January 30, 2017.

Attorneys for the Plaintiff

By: /s/*David C. Zoeller*

**HAWKS QUINDEL, S.C.**

David C. Zoeller, WI State Bar No. 1052017

Email: dzoeller@hq-law.com

Caitlin M. Madden, WI State Bar No. 1089238

Email: cmadden@hq-law.com

Post Office Box 2155

Madison, Wisconsin 53701-2155

Telephone: (608) 257-0040

**WERMAN SALAS P.C.**

Douglas M. Werman, IL State Bar No. 6204740

Email: dwerman@flsalaw.com

77 W. Washington, Suite 1402

Chicago, Illinois 60602

Telephone: (312) 419-1008